

# **EXHIBIT C**

## **to Plaintiff's Motion for Sanctions**

**Defendant Cannata's Second  
Supplemental Answers and Objections to  
Plaintiff HP Tuner (sic), LLC's First Set  
of Interrogatories**

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10 *Kenneth Cannata*

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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HP TUNERS, LLC,

Plaintiff,

vs.

KENNETH CANNATA,

Defendant.

CASE NO. 3:18-cv-00527-LRH-WGC

**DEFENDANT CANNATA'S SECOND  
SUPPLEMENTAL ANSWERS AND  
OBJECTIONS TO PLAINTIFF HP  
TUNER, LLC'S FIRST SET OF  
INTERROGATORIES**

Defendant Kenneth Cannata ("Cannata" or "Defendant"), by and through his counsel of record, hereby submits this second supplemental response to Plaintiff HP Tuners, LLC's ("HPT" or "Plaintiff") First Set of Interrogatories as follows (supplemental information is indicated in **bold** typeface):

**FIRST SUPPLEMENTAL RESPONSES TO PLAINTIFF'S INTERROGATORIES**

Defendant responds to Plaintiff's Interrogatories as follows:

**INTERROGATORY NO. 1:**

Identify by make, model and serial number, all computers used by Defendant at any time from January 1, 2016 to the present. For each such computer identified, state the current address and location of each such computer.

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1 ANSWER TO INTERROGATORY NO. 1:

2 Cannata objects to this Interrogatory on the basis that (i) it seeks the disclosure of information  
3 already in the possession of HPT or readily available to HPT, (ii) it seeks the disclosure of  
4 information that is not relevant to any claim or defense at issue in this action, (iii) it imposes an  
5 undue burden on Cannata, and (iv) it is vague as to the terms “computer” and “used.” Without  
6 waiving any objection, Cannata responds as follows: From January 1, 2016 until the sale of his  
7 membership interest in HPT, Cannata used a custom desktop computer that he assembled using parts  
8 purchased from various sources. That desktop computer did not have a manufacturer’s serial number  
9 and was sent to HPT upon the sale of Cannata’s membership interest in HPT. Cannata has in his  
10 possession a second custom desktop computer that he assembled using parts purchased from various  
11 sources. This second desktop computer does not have a manufacturer’s serial number. Cannata has  
12 access to a Hewlett Packard laptop computer. The manufacturer’s serial number of that laptop  
13 computer is CND7060N3T. The second custom desktop computer and the Hewlett Packard laptop  
14 computer are located at Cannata’s personal residence at 16455 Bonnie Lane, Reno, Nevada 89511.

15 INTERROGATORY NO. 2:

16 Identify all Documents (including but not limited to electronically stored information) which  
17 evidence, refer or relate to HPT’s source code, software, programming, products and/or credits  
18 which have been in Your possession, custody or control at any time on or after October 21, 2016.

19 ANSWER TO INTERROGATORY NO. 2:

20 Cannata objects to this Interrogatory on the basis that (i) it imposes an undue burden on  
21 Cannata, and (ii) it is vague as to the terms “evidence, refer or relate” and “HPT’s source code,  
22 software, programming, products and/or credits.” Without waiving any objection, Cannata responds  
23 as follows: Cannata has in his possession an administrative version of HPT’s VCM Suite software,  
24 **which is stored on the hard drive of the Hewlett Packard laptop computer referenced in**  
25 **Cannata’s answer to Interrogatory No. 1. That Hewlett Packard laptop computer will be made**  
26 **available to Exponent, Inc. for copying in accordance with the Order entered by the Court on**  
27 **August 20, 2020 [ECF No. 80]. Alternatively, Cannata will provide an electronic copy of such**  
28 **VCM Suite software on request. Additionally, because the transaction by which Cannata**

1 assigned his membership interest in HPT did not close until several weeks after the expected  
2 closing date of October 21, 2016, Cannata maintained possession, custody, or control of  
3 documents and electronically stored information related to HPT after October 21, 2016. Such  
4 documents and electronically stored information included the contents of the custom desktop  
5 computer referenced in Cannata's answer to Interrogatory No. 1, a nonfunctional IBM  
6 Thinkpad laptop computer that had not been used since January 1, 2016, an iPhone 4, and a  
7 Lexar 16GB USB drive – all of which Cannata believes were delivered to HPT sometime in  
8 November or December 2016. Cannata does not have access to and does not have any record  
9 of the contents of the aforementioned custom desktop computer, the IBM Thinkpad laptop  
10 computer, or the iPhone 4. However, an index of the electronic files stored on the Lexar 16GB  
11 USB drive, which was prepared by Cannata's legal counsel prior to delivery to HPT, is  
12 attached hereto as Exhibit 1. To the best of Cannata's knowledge, any copies of any documents  
13 or other electronic information stored on the aforementioned custom desktop computer, the  
14 IBM Thinkpad laptop computer, iPhone 4, or Lexar 16GB USB drive that remained in  
15 Cannata's possession after October 21, 2016, as well as any other confidential or proprietary  
16 information related to HPT, were deleted at or around the time that Cannata received  
17 payment for the assignment of his membership interest in HPT.

18 INTERROGATORY NO. 3:

19 Identify all Documents (including but not limited to electronically stored information) which  
20 evidence refer or relate to HPT's interfaces, source code, designs, schematics, program files,  
21 software, firmware or other intellectual property of HPT which have been in Your possession,  
22 custody or control at any time on or after October 21, 2016.

23 ANSWER TO INTERROGATORY NO. 3:

24 Cannata objects to this Interrogatory on the basis that (i) it imposes an undue burden on  
25 Cannata, and (ii) it is vague as to the terms "evidence refer or relate" and "HPT's interfaces, source  
26 code, designs, schematics, program files, software, firmware or other intellectual property of HPT."  
27 Without waiving any objection, Cannata responds as follows: Cannata has in his possession an  
28 administrative version of HPT's VCM Suite software, **which is stored on the hard drive of the**

1 Hewlett Packard laptop computer referenced in Cannata's answer to Interrogatory No. 1.  
2 That Hewlett Packard laptop computer will be made available to Exponent, Inc. for copying  
3 in accordance with the Order entered by the Court on August 20, 2020 [ECF No. 80].  
4 Alternatively, Cannata will provide an electronic copy of such VCM Suite software on request.  
5 Additionally, because the transaction by which Cannata assigned his membership interest in  
6 HPT did not close until several weeks after the expected closing date of October 21, 2016,  
7 Cannata maintained possession, custody, or control of documents and electronically stored  
8 information related to HPT after October 21, 2016. Such documents and electronically stored  
9 information included the contents of the custom desktop computer referenced in Cannata's  
10 answer to Interrogatory No. 1, a nonfunctional IBM Thinkpad laptop computer that had not  
11 been used since January 1, 2016, an iPhone 4, and a Lexar 16GB USB drive – all of which  
12 Cannata believes were delivered to HPT sometime in November or December 2016. Cannata  
13 does not have access to and does not have any record of the contents of the aforementioned  
14 custom desktop computer, the IBM Thinkpad laptop computer, or the iPhone 4. However, an  
15 index of the electronic files stored on the Lexar 16GB USB drive, which was prepared by  
16 Cannata's legal counsel prior to delivery to HPT, is attached hereto as Exhibit 1. To the best  
17 of Cannata's knowledge, any copies of any documents or other electronic information stored  
18 on the aforementioned custom desktop computer, the IBM Thinkpad laptop computer, iPhone  
19 4, or Lexar 16GB USB drive that remained in Cannata's possession after October 21, 2016, as  
20 well as any other confidential or proprietary information related to HPT, were deleted at or  
21 around the time that Cannata received payment for the assignment of his membership interest  
22 in HPT.

23 INTERROGATORY NO. 4:

24 Identify all Documents (including but not limited to electronically stored information)  
25 relating to HPT's MPVI which have been in Your possession, custody or control at any time on or  
26 after October 21, 2016.

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1 ANSWER TO INTERROGATORY NO. 4:

2 Cannata objects to this Interrogatory on the basis that (i) it imposes an undue burden on  
3 Cannata, and (ii) it is vague as to the term “relating to HPT’s MPVI.” Without waiving any  
4 objection, Cannata responds as follows: Cannata has in his possession an administrative version of  
5 HPT’s VCM Suite software, **which is stored on the hard drive of the Hewlett Packard laptop**  
6 **computer referenced in Cannata’s answer to Interrogatory No. 1.** That Hewlett Packard  
7 laptop computer will be made available to Exponent, Inc. for copying in accordance with the  
8 Order entered by the Court on August 20, 2020 [ECF No. 80]. Alternatively, Cannata will  
9 provide an electronic copy of such VCM Suite software on request. Additionally, because the  
10 transaction by which Cannata assigned his membership interest in HPT did not close until  
11 several weeks after the expected closing date of October 21, 2016, Cannata maintained  
12 possession, custody, or control of documents and electronically stored information related to  
13 HPT after October 21, 2016. Such documents and electronically stored information included  
14 the contents of the custom desktop computer referenced in Cannata’s answer to Interrogatory  
15 No. 1, a nonfunctional IBM Thinkpad laptop computer that had not been used since January  
16 1, 2016, an iPhone 4, and a Lexar 16GB USB drive – all of which Cannata believes were  
17 delivered to HPT sometime in November or December 2016. Cannata does not have access to  
18 and does not have any record of the contents of the aforementioned custom desktop computer,  
19 the IBM Thinkpad laptop computer, or the iPhone 4. However, an index of the electronic files  
20 stored on the Lexar 16GB USB drive, which was prepared by Cannata’s legal counsel prior to  
21 delivery to HPT, is attached hereto as Exhibit 1. To the best of Cannata’s knowledge, any  
22 copies of any documents or other electronic information stored on the aforementioned custom  
23 desktop computer, the IBM Thinkpad laptop computer, iPhone 4, or Lexar 16GB USB drive  
24 that remained in Cannata’s possession after October 21, 2016, as well as any other confidential  
25 or proprietary information related to HPT, were deleted at or around the time that Cannata  
26 received payment for the assignment of his membership interest in HPT.

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1 INTERROGATORY NO. 5:

2 State all email addresses You have used to send email communications to Kevin Sykes-  
3 Bonnett at any time since January 1, 2016.

4 ANSWER TO INTERROGATORY NO. 5:

5 Without waiving any objection, Cannata responds as follows: To the best of Cannata's  
6 knowledge and recollection, the email addresses Cannata used to communication with Kevin Sykes-  
7 Bonnett after January 1, 2016 include [ken\\_cannata@att.net](mailto:ken_cannata@att.net), [ken\\_cannata@charter.net](mailto:ken_cannata@charter.net),  
8 [somethingnew1892@yahoo.com](mailto:somethingnew1892@yahoo.com), and, possibly, [ken@hptuners.com](mailto:ken@hptuners.com).

9 INTERROGATORY NO. 6:

10 List all payments you have received from Kevin Sykes-Bonnett, John Martinson or Syked  
11 ECU Tuning, Inc. at any time since January 1, 2016 including the date and amount of each payment  
12 and describe the service performed for each such payment.

13 ANSWER TO INTERROGATORY NO. 6:

14 Without waiving any objection, Cannata responds as follows: To the best of Cannata's  
15 knowledge and recollection, he has not received any payment in any material amount from either  
16 Kevin Sykes-Bonnett, John Martinson, or Syked ECU Tuning, Inc. at any time since January 1,  
17 2016.

18 INTERROGATORY NO. 7:

19 List all internet service providers you have used for each of Your residences at any time since  
20 January 1, 2016, including the time period of service for each such internet service provider.

21 ANSWER TO INTERROGATORY NO. 7:

22 Cannata objects to this Interrogatory on the basis that (i) it imposes an undue burden on  
23 Cannata, and (ii) it seeks the disclosure of information that is not relevant to any claim or defense at  
24 issue in this action. Without waiving any objection, Cannata responds as follows: To the best of  
25 Cannata's knowledge and recollection internet service providers he has used since January 1, 2016  
26 include Time Warner Cable (terminated late 2014 or early 2015), AT&T (terminated May 2018),  
27 Charter Communications (May 2018 to present).

1 INTERROGATORY NO. 8:

2 State the name, state of incorporation or organization, date of incorporation or organization  
3 and all shareholders or members (including the percentages of ownership) of any non-public  
4 company, corporation or entity in which you have held an ownership interest at any time since  
5 October 21, 2016.

6 ANSWER TO INTERROGATORY NO. 8:

7 Cannata objects to this Interrogatory on the basis that it seeks the disclosure of information  
8 that is not relevant to any claim or defense at issue in this action. Without waiving any objection,  
9 Cannata responds as follows: Cannata owns 100% of KJC Communications, LLC, which was  
10 registered as a Nevada partnership on or about October 1, 2018. KJC Communications, LLC has  
11 never engaged in any business operations and has never owned any assets.

12 INTERROGATORY NO. 9:

13 If any of the responses to Plaintiff's Requests for Admission are anything other than an  
14 unqualified admission, describe the complete factual basis for Defendant's response.

15 ANSWER TO INTERROGATORY NO. 9:

16 Cannata objects to this Interrogatory on the basis that it imposes an undue burden on Cannata.  
17 Without waiving any objection, Cannata responds as follows: The factual basis for each of Cannata's  
18 responses to HPT's Requests for Admission are set forth in detail within such responses.

19 DATED this 3rd day of September 2020.

20 SHEA LARSEN

21 By /s/ Bart K. Larsen, Esq.  
22 Bart K. Larsen, Esq.

23 Nevada Bar No. 8538  
24 1731 Village Center Circle, Suite 150  
25 Las Vegas, Nevada 89134

26 *Attorneys for Defendant Kenneth Cannata*

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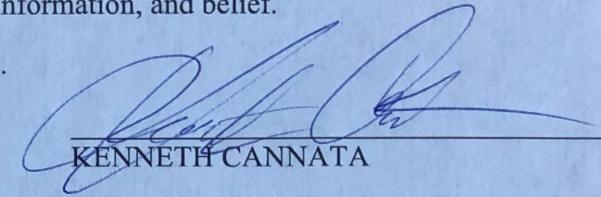
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1 **VERIFICATION**

2 I, Kenneth Cannata, have read the entirety of the foregoing Second Supplemental Responses  
3 to Plaintiff HP Tuner, LLC's First Set of Interrogatories, and I hereby verify that such responses are  
4 true and correct to the best of my knowledge, information, and belief.

5 Dated 12/17/2020, 2020.

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7 KENNETH CANNATA

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Name	Path	Extension	Size	Modified
662X HDW 121 V119.mcp	F:\662X HDW 121 V120\	mcp	96,957	6/17/2006 21:04
AAA.atxt	F:\662X HDW 121 V120\	atxt	37	6/13/2005 13:12
Asm_layout.hwl	F:\662X HDW 121 V120\	hwl	633	8/10/2015 22:09
Default.mem	F:\662X HDW 121 V120\	mem	161	11/27/2002 0:24
defs_documentation.txt	F:\662X HDW 121 V120\	txt	6,927	6/19/2002 10:51
project.hwc	F:\662X HDW 121 V120\	hwc	0	8/10/2015 22:09
project.ini	F:\662X HDW 121 V120\	ini	4,958	10/2/2015 9:52
readme.txt	F:\662X HDW 121 V120\	txt	1,317	11/27/2002 0:32
CWSettingsWindows.stg	F:\662X HDW 121 V120\662X_HDW_121_V118_Data\	stg	4,264	8/10/2015 21:02
TargetDataWindows.tdt	F:\662X HDW 121 V120\662X_HDW_121_V118_Data\Abatron\	tdt	36,601	8/10/2015 20:32
TargetDataWindows.tdt	F:\662X HDW 121 V120\662X_HDW_121_V118_Data\P&E\	tdt	2,368,473	8/10/2015 20:32
main.asm.o	F:\662X HDW 121 V120\662X_HDW_121_V118_Data\P&E\ObjectCode\	o	405,932	8/10/2015 20:32
TargetDataWindows.tdt	F:\662X HDW 121 V120\662X_HDW_121_V118_Data\Simulator\	tdt	283,695	8/10/2015 20:32
main.asm.o	F:\662X HDW 121 V120\662X_HDW_121_V118_Data\Simulator\ObjectCode\	o	404,700	2/11/2013 12:18
CWSettingsWindows.stg	F:\662X HDW 121 V120\662X_HDW_121_V119_Data\	stg	4,329	6/17/2006 21:04
TargetDataWindows.tdt	F:\662X HDW 121 V120\662X_HDW_121_V119_Data\Abatron\	tdt	36,601	6/17/2006 21:04
TargetDataWindows.tdt	F:\662X HDW 121 V120\662X_HDW_121_V119_Data\P&E\	tdt	886,737	6/17/2006 21:04
main.asm.o	F:\662X HDW 121 V120\662X_HDW_121_V119_Data\P&E\ObjectCode\	o	406,180	10/21/2015 23:18
TargetDataWindows.tdt	F:\662X HDW 121 V120\662X_HDW_121_V119_Data\Simulator\	tdt	280,969	6/17/2006 21:04
main.asm.o	F:\662X HDW 121 V120\662X_HDW_121_V119_Data\Simulator\ObjectCode\	o	405,932	8/10/2015 22:06
Asm_PandE.abs	F:\662X HDW 121 V120\bin\	abs	239,803	10/2/2015 9:51
Asm_PandE.abs.bootloaderPE.s19	F:\662X HDW 121 V120\bin\	s19	9,712	10/2/2015 9:51
Asm_PandE.abs.phy	F:\662X HDW 121 V120\bin\	phy	102,122	10/2/2015 9:51
Asm_PandE.abs.s19	F:\662X HDW 121 V120\bin\	s19	100,892	10/2/2015 9:51
Asm_PandE.bpt	F:\662X HDW 121 V120\bin\	bpt	12	10/2/2015 9:52
Asm_PandE.map	F:\662X HDW 121 V120\bin\	map	726,612	10/2/2015 9:51
Asm_PandE.mrk	F:\662X HDW 121 V120\bin\	mrk	21	10/2/2015 9:52
asm_simulator.abs	F:\662X HDW 121 V120\bin\	abs	239,655	8/10/2015 22:06
asm_simulator.abs.bootloaderPE.s19	F:\662X HDW 121 V120\bin\	s19	9,726	8/10/2015 22:06
asm_simulator.abs.phy	F:\662X HDW 121 V120\bin\	phy	102,022	8/10/2015 22:06
asm_simulator.abs.s19	F:\662X HDW 121 V120\bin\	s19	100,796	8/10/2015 22:06
asm_simulator.bpt	F:\662X HDW 121 V120\bin\	bpt	12	8/10/2015 22:10
asm_simulator.map	F:\662X HDW 121 V120\bin\	map	726,230	8/10/2015 22:06
asm_simulator.mrk	F:\662X HDW 121 V120\bin\	mrk	21	8/10/2015 22:10
main.dbg	F:\662X HDW 121 V120\bin\	dbg	786,240	10/21/2015 23:18
62XX_HDW121_BOOTLOADER_1_2.phy	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	phy	11,496	7/23/2006 15:00
62XX_HDW121_BOOTLOADER_1_2.s19	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	s19	9,712	7/23/2006 14:56
62XX_HDW121_BOOTLOADER_1_3.phy	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	phy	11,496	1/6/2009 12:34
62XX_HDW121_BOOTLOADER_1_3.s19	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	s19	9,712	1/6/2009 12:31
62XX_HDW121_BOOTLOADER_1_3.s19.extra	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	extra	0	1/6/2009 12:34

MC9S12DJ256B.12P	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	12P	3,798	12/19/2005 17:23
MPVI_121.cfg	F:\662X HDW 121 V120\bin\Cylcone Pro Files\	cfg	1,208	4/5/2006 19:13
Public version 120.BIN	F:\662X HDW 121 V120\bin\MPVI_All_Upgrade\	BIN	4,063,232	10/1/2015 14:42
Public version 120.firmware	F:\662X HDW 121 V120\bin\MPVI_All_Upgrade\	firmware	44,964	10/1/2015 14:43
Internal version 120.BIN	F:\662X HDW 121 V120\bin\MPVI_INTERNAL\	BIN	4,063,232	10/2/2015 9:53
Internal version 120.firmware	F:\662X HDW 121 V120\bin\MPVI_INTERNAL\	firmware	44,964	10/2/2015 9:54
abatron_postload.cmd	F:\662X HDW 121 V120\cmd\	cmd	169	9/26/2002 10:03
abatron_preload.cmd	F:\662X HDW 121 V120\cmd\	cmd	363	9/26/2002 10:04
abatron_reset.cmd	F:\662X HDW 121 V120\cmd\	cmd	63	1/17/2001 14:01
abatron_startup.cmd	F:\662X HDW 121 V120\cmd\	cmd	59	1/17/2001 14:02
p&e_erase_unsecure_hcs12.cmd	F:\662X HDW 121 V120\cmd\	cmd	2,658	10/29/2005 16:47
p&e_postload.cmd	F:\662X HDW 121 V120\cmd\	cmd	275	7/17/2005 15:48
p&e_preload.cmd	F:\662X HDW 121 V120\cmd\	cmd	369	10/29/2005 16:56
p&e_reset.cmd	F:\662X HDW 121 V120\cmd\	cmd	63	1/17/2001 14:01
p&e_startup.cmd	F:\662X HDW 121 V120\cmd\	cmd	59	1/17/2001 14:02
p&e_vppoff.cmd	F:\662X HDW 121 V120\cmd\	cmd	75	9/26/2002 9:52
p&e_vppon.cmd	F:\662X HDW 121 V120\cmd\	cmd	76	9/26/2002 9:52
simulator_postload.cmd	F:\662X HDW 121 V120\cmd\	cmd	62	1/17/2001 14:01
simulator_preload.cmd	F:\662X HDW 121 V120\cmd\	cmd	81	11/13/2004 10:35
simulator_reset.cmd	F:\662X HDW 121 V120\cmd\	cmd	63	1/17/2001 14:01
simulator_setcpu.cmd	F:\662X HDW 121 V120\cmd\	cmd	59	1/17/2001 14:01
simulator_startup.cmd	F:\662X HDW 121 V120\cmd\	cmd	59	1/17/2001 14:02
Cable responses.txt	F:\662X HDW 121 V120\Documents\	txt	5,173	7/31/2005 19:52
Canbus Scan.txt	F:\662X HDW 121 V120\Documents\	txt	2,908	2/4/2006 18:41
Log Setup Sample.txt	F:\662X HDW 121 V120\Documents\	txt	13,641	4/26/2006 13:27
Logging MemMap.xls	F:\662X HDW 121 V120\Documents\	xls	24,576	4/26/2006 13:29
TestMessages.txt	F:\662X HDW 121 V120\Documents\	txt	2,764	4/29/2006 9:27
_MC9S12DP256_BANKED.prm.txt	F:\662X HDW 121 V120\Memory Models\	txt	9,288	5/3/2002 12:36
_MC9S12DP256_FLAT.prm.txt	F:\662X HDW 121 V120\Memory Models\	txt	8,245	4/17/2002 12:09
_MC9S12DP256_RAM.prm.txt	F:\662X HDW 121 V120\Memory Models\	txt	3,923	4/15/2002 17:05
Boot.asm	F:\662X HDW 121 V120\Other Source code\Boot Test Code\	asm	25,873	11/24/2004 16:35
Copy of Bootloader.asm	F:\662X HDW 121 V120\Other Source code\Boot Test Code\	asm	41,860	11/23/2004 21:58
BLCKHNDL.asm	F:\662X HDW 121 V120\Other Source code\From HCS08\	asm	7,034	11/19/2004 13:46
DLCRX_HC08.asm	F:\662X HDW 121 V120\Other Source code\From HCS08\	asm	17,532	11/13/2004 21:27
Main.asm	F:\662X HDW 121 V120\Other Source code\From HCS08\	asm	102,560	9/18/2004 12:07
boak.asm	F:\662X HDW 121 V120\Other Source code\SC Algo\	asm	9,936	9/5/2005 13:51
BoakFuncs.c.lst	F:\662X HDW 121 V120\Other Source code\SC Algo\	lst	16,030	9/5/2005 13:50
ford_pcm_COMMANDS.H	F:\662X HDW 121 V120\Other Source code\SC Algo\	H	14,176	9/14/2005 16:09
Ford SCP.lst	F:\662X HDW 121 V120\Other Source code\SC Algo\	lst	160,781	9/13/2005 18:20
Ford SCP_KEN.lst	F:\662X HDW 121 V120\Other Source code\SC Algo\	lst	193,101	10/10/2005 17:40
lbcc.lst	F:\662X HDW 121 V120\Other Source code\SC Algo\	lst	25,548	9/16/2005 19:57

LBCC_ISR.c	F:\662X HDW 121 V120\Other Source code\SC Algo\	c	13,513	9/14/2005 16:09
SCP.ASM	F:\662X HDW 121 V120\Other Source code\SC Algo\	ASM	19,444	9/13/2005 21:28
appkey.cpp	F:\662X HDW 121 V120\Other Source code\VCM Suite\	cpp	16,223	1/13/2006 16:50
frmVCMScanner.c	F:\662X HDW 121 V120\Other Source code\VCM Suite\	c	40,865	10/11/2005 16:13
Slave_Flash.asm	F:\662X HDW 121 V120\Other Source code\Z06\	asm	10,289	10/4/2005 22:17
burner.bbl	F:\662X HDW 121 V120\prm\	bbl	5,051	9/28/2005 20:06
linker.prm	F:\662X HDW 121 V120\prm\	prm	3,522	3/14/2005 20:39
DP256reg.inc	F:\662X HDW 121 V120\Sources\	inc	30,015	11/10/2014 13:28
Endian Conv.txt	F:\662X HDW 121 V120\Sources\	txt	467	9/13/2005 11:14
main.asm	F:\662X HDW 121 V120\Sources\	asm	26,429	10/2/2015 9:46
mc9s12dj256.inc	F:\662X HDW 121 V120\Sources\	inc	678,994	10/20/2005 17:31
P30DATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	3,609	4/18/2011 13:48
P31DATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	823	12/27/2005 14:42
P32ALGO.ASM	F:\662X HDW 121 V120\Sources\	ASM	524	5/20/2006 8:56
P33ALGO.ASM	F:\662X HDW 121 V120\Sources\	ASM	13,409	3/12/2015 18:30
P34DATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	16,740	9/29/2015 19:51
P35DATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	604	3/27/2010 9:35
P36ALGO.ASM	F:\662X HDW 121 V120\Sources\	ASM	412	2/14/2006 12:47
P37ALGO.ASM	F:\662X HDW 121 V120\Sources\	ASM	343	12/29/2005 12:24
P38DATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	342	12/29/2005 12:25
P39DATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	342	12/29/2005 12:25
P3AALGO.ASM	F:\662X HDW 121 V120\Sources\	ASM	340	12/29/2005 12:26
P3BALGO.ASM	F:\662X HDW 121 V120\Sources\	ASM	351	12/29/2005 12:26
P3CDATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	339	12/29/2005 12:26
P3DDATA.ASM	F:\662X HDW 121 V120\Sources\	ASM	377	12/29/2005 12:27
boak.asm	F:\662X HDW 121 V120\Sources\BACKSTAGE\	asm	9,116	3/19/2008 21:32
GM_KEYS.ASM	F:\662X HDW 121 V120\Sources\BACKSTAGE\	ASM	12,082	6/29/2006 11:37
MAGIC_KEYS.ASM	F:\662X HDW 121 V120\Sources\BACKSTAGE\	ASM	12,988	7/1/2006 12:15
SCP_KEY.ASM	F:\662X HDW 121 V120\Sources\BACKSTAGE\	ASM	19,205	3/19/2008 21:36
Flash.asm	F:\662X HDW 121 V120\Sources\BootSection\	asm	38,399	5/20/2006 9:12
NONPAGED_CHECKS.ASM	F:\662X HDW 121 V120\Sources\BootSection\	ASM	3,065	2/11/2006 14:17
PPAGE_CHECKS.ASM	F:\662X HDW 121 V120\Sources\BootSection\	ASM	6,739	12/8/2014 11:25
CANOERR_ISR.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	2,694	7/14/2005 19:02
CANORX_ISR.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	3,023	3/20/2015 12:10
CAN0TXPROCESS.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	6,962	3/12/2015 19:39
CAN1ERR_ISR.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	2,694	10/20/2005 20:35
CAN1RX_ISR.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	2,754	3/16/2006 18:20
CAN1TXPROCESS.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	4,328	2/8/2006 11:02
CANMODULE_INIT.ASM	F:\662X HDW 121 V120\Sources\Cancode\	ASM	16,839	4/24/2013 10:20
4 16 bit.txt	F:\662X HDW 121 V120\Sources\Cancode\CAN Filters\	txt	1,156	12/1/2004 10:11
6210_MPVI_STD.ASM	F:\662X HDW 121 V120\Sources\EEPROM\	ASM	3,152	2/16/2006 13:35

6220_INTERNAL.ASM	F:\662X HDW 121 V120\Sources\EEPROM\	ASM	3,154	2/11/2013 15:00
6220_MPVI_PRO.ASM	F:\662X HDW 121 V120\Sources\EEPROM\	ASM	3,152	11/25/2013 17:25
CABLE_AUX.ASM	F:\662X HDW 121 V120\Sources\Ext_Hardware\	ASM	2,490	2/4/2006 9:52
CLEAR_DTC.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\DTCL\	ASM	71	12/16/2005 20:55
GET_USER_INPUT.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Global\	ASM	8,144	6/17/2006 17:22
SYS_PREP.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Global\	ASM	7,088	6/18/2006 10:44
USER_KERNEL.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Global\	ASM	1,970	6/17/2006 8:04
VEH_INIT_COMM.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Global\	ASM	3,025	6/17/2006 15:28
LOG_DATA_FILTER.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Logging\	ASM	2,237	6/18/2006 7:53
LOG_DATA_STORE.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Logging\	ASM	9,861	6/17/2006 8:09
CAN_FILTER.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Logging\CAN\	ASM	5,415	9/23/2015 22:28
CAN_LCOMMS.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Logging\CAN\	ASM	7,281	9/29/2015 19:42
VPW_FILTER.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Logging\VPW\	ASM	5,229	6/17/2006 16:10
VPW_LCOMMS.ASM	F:\662X HDW 121 V120\Sources\EXT_USER\Logging\VPW\	ASM	7,232	9/29/2015 19:49
FTDIEECFG.ASM	F:\662X HDW 121 V120\Sources\FTDI\	ASM	10,878	1/28/2006 9:04
HP Tuners MPVI D018 HPT0021 BLANK.ASM	F:\662X HDW 121 V120\Sources\FTDI\	ASM	3,222	12/1/2005 19:51
HP Tuners MPVI D018 HPT0021 USER.ASM	F:\662X HDW 121 V120\Sources\FTDI\	ASM	3,738	12/1/2005 19:56
HP Tuners MPVI D018 HPT0021 .txt	F:\662X HDW 121 V120\Sources\FTDI\HP Tuners MPVI D018 HPT0021\	txt	1,343	12/1/2005 19:09
HP Tuners MPVI D018 HPT0021 BLANK.ASM	F:\662X HDW 121 V120\Sources\FTDI\HP Tuners MPVI D018 HPT0021\	ASM	3,222	12/1/2005 19:51
HP Tuners MPVI D018 HPT0021 USER.ASM	F:\662X HDW 121 V120\Sources\FTDI\HP Tuners MPVI D018 HPT0021\	ASM	3,738	12/1/2005 19:56
HP Tuners MPVI.ept	F:\662X HDW 121 V120\Sources\FTDI\HP Tuners MPVI D018 HPT0021\	ept	982	12/1/2005 18:56
MPVI PRO D018 HPT0021 .txt	F:\662X HDW 121 V120\Sources\FTDI\MPVI PRO D018 HPT0021\	txt	1,345	7/27/2005 20:28
MPVI PRO D018 HPT0021 BLANK.ASM	F:\662X HDW 121 V120\Sources\FTDI\MPVI PRO D018 HPT0021\	ASM	3,222	7/27/2005 20:31
MPVI PRO D018 HPT0021 USER.ASM	F:\662X HDW 121 V120\Sources\FTDI\MPVI PRO D018 HPT0021\	ASM	3,732	7/27/2005 20:37
MPVI PRO.ept	F:\662X HDW 121 V120\Sources\FTDI\MPVI PRO D018 HPT0021\	ept	975	7/27/2005 20:23
5_BAUD_INIT.ASM	F:\662X HDW 121 V120\Sources\ISO_KWP_ALDL\	ASM	5,556	3/19/2008 19:15
SCI_INIT.ASM	F:\662X HDW 121 V120\Sources\ISO_KWP_ALDL\	ASM	2,474	3/19/2008 16:55
SCI_TX_ISR.ASM	F:\662X HDW 121 V120\Sources\ISO_KWP_ALDL\	ASM	2,667	8/11/2015 23:10
SCI_TX_NORMAL.ASM	F:\662X HDW 121 V120\Sources\ISO_KWP_ALDL\	ASM	2,266	1/29/2006 16:26
SCI0RX.ASM	F:\662X HDW 121 V120\Sources\ISO_KWP_ALDL\	ASM	8,416	8/15/2011 21:07
SCITXPROCESS.ASM	F:\662X HDW 121 V120\Sources\ISO_KWP_ALDL\	ASM	8,450	8/11/2015 22:18
BLCKHNDL.asm	F:\662X HDW 121 V120\Sources\J1850\J1850\	asm	2,973	3/16/2006 18:09
J1850PWCFG.ASM	F:\662X HDW 121 V120\Sources\J1850\J1850\	ASM	4,225	9/16/2005 11:41
TXBLCKMSG.asm	F:\662X HDW 121 V120\Sources\J1850\J1850\	asm	4,255	3/16/2006 18:09
TXVPWMMSG.asm	F:\662X HDW 121 V120\Sources\J1850\J1850\	asm	4,392	3/16/2006 18:08
VPWRX.ASM	F:\662X HDW 121 V120\Sources\J1850\J1850\	ASM	12,335	12/25/2005 11:07
VPWTXPROCESS.ASM	F:\662X HDW 121 V120\Sources\J1850\J1850\	ASM	8,408	3/16/2006 18:08
J1850PWMCFG.ASM	F:\662X HDW 121 V120\Sources\J1850\J1850\	ASM	7,078	2/18/2010 16:52
PWMRX.ASM	F:\662X HDW 121 V120\Sources\J1850\J1850\	ASM	8,503	1/21/2010 16:30
PWMTXPROCESS.ASM	F:\662X HDW 121 V120\Sources\J1850\J1850\	ASM	4,307	11/19/2009 12:30
APPKEY_CREDIT.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	3,143	3/28/2007 10:05

APPKEY_CSUM.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	4,711	2/16/2006 22:34
APPKEY_SERIAL.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	4,864	2/26/2011 12:12
APPKEY_VERSION.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	8,407	2/14/2006 12:00
BIT_TESTER.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	297	2/7/2006 17:43
CONV_CHAR.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	4,820	1/29/2006 11:18
CREDIT_CNTR.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,037	2/3/2006 21:15
ERASELICENSE.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,899	1/9/2006 11:51
FCSUMFBlock.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	907	12/31/2005 20:09
FIND_LPAGE.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	1,867	1/9/2006 10:57
FLASHWRPREP.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	1,689	5/20/2006 8:25
LIC_CNTR.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,037	1/9/2006 11:46
LICENSE_LOOP.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	22,557	5/17/2006 19:09
LICENSING_MAIN.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	11,915	2/15/2006 19:42
LPAGE_CHECKS.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	1,002	8/25/2005 10:37
MOVELICENSE.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,896	2/7/2006 13:12
NEW_APPKEY_FUNCT.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	3,922	2/14/2006 16:23
NEW_APPKEYDECRYPT_FUNCT.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,361	1/9/2006 14:11
NEW_LICENSEDECRYPT_FUNCT.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,368	1/9/2006 14:26
NEW_LICTEST_FUNCT.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	4,401	2/10/2006 17:05
NPAGECSUM.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	284	8/25/2005 10:40
RETURN_NORMAL.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	2,318	5/15/2006 14:32
SLOT_REPORT.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	3,349	1/9/2006 11:54
SLOT_REPORT_SEI.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	3,483	1/9/2006 11:56
TSTPAGECSUM.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	409	8/25/2005 10:41
WRITE_LICENSE.ASM	F:\662X HDW 121 V120\Sources\Licensing\	ASM	5,025	1/9/2006 11:49
GEN_MATH.ASM	F:\662X HDW 121 V120\Sources\MATH\	ASM	41	1/23/2006 11:19
ADTO_ISR.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	305	12/25/2005 10:46
BUSDETECT.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	8,843	3/20/2015 17:20
BUSLISTEN.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	1,739	2/16/2006 17:02
DATA_CLEANUP.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	3,325	3/16/2006 18:22
FIFOPTINIT.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	1,307	12/8/2005 12:31
OPSYS.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	27,274	9/8/2015 23:07
OPSYS_HI.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	6,512	10/2/2015 9:49
PLL_ISR.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	554	5/15/2006 10:02
RECONFIG.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	19,894	2/18/2010 17:29
SELF CLOCK_ISR.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	606	5/15/2006 10:22
SYS_INIT.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	16,627	5/23/2006 17:49
SYSTEM_CONFIG.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	9,190	3/16/2006 18:21
UNUSEDCOMMANDVEC.ASM	F:\662X HDW 121 V120\Sources\OperatingSystem\	ASM	806	3/7/2005 17:36
SYSTEM_RAM.ASM	F:\662X HDW 121 V120\Sources\RamNonMoveable\	ASM	6,495	2/3/2006 20:14
ROM_ACCESS.ASM	F:\662X HDW 121 V120\Sources\Rom_Access\	ASM	4,891	4/29/2006 19:22

BACKDOOR.ASM	F:\662X HDW 121 V120\Sources\Security\	ASM	876	11/30/2005 20:56
DestroyFLash.asm	F:\662X HDW 121 V120\Sources\Security\	asm	4,329	3/27/2010 9:20
HPT_SEED_KEY.ASM	F:\662X HDW 121 V120\Sources\Security\	ASM	3,926	12/28/2005 11:42
HPTSECURITY.ASM	F:\662X HDW 121 V120\Sources\Security\	ASM	11,267	6/16/2006 10:39
REPROG.asm	F:\662X HDW 121 V120\Sources\Security\	asm	38,960	5/20/2006 8:54
REPROGCRYPT.ASM	F:\662X HDW 121 V120\Sources\Security\	ASM	1,252	3/9/2005 14:00
TATTLE_TALE.ASM	F:\662X HDW 121 V120\Sources\Security\	ASM	3,120	12/29/2005 12:23
VANISH.ASM	F:\662X HDW 121 V120\Sources\Security\	ASM	3,301	3/27/2010 9:19
SPIFLASH.ASM	F:\662X HDW 121 V120\Sources\SPI_Flash\	ASM	17,006	5/31/2006 17:45
NX25916_0.ASM	F:\662X HDW 121 V120\Sources\SPI_Flash\NEXFLASH\	ASM	25,529	6/13/2012 13:16
NX25916_1.ASM	F:\662X HDW 121 V120\Sources\SPI_Flash\NEXFLASH\	ASM	7,032	6/17/2006 11:38
LOGGING.ASM	F:\662X HDW 121 V120\Sources\SPI_Flash\STS\	ASM	15,510	9/15/2005 17:55
MSEC_TIMER.ASM	F:\662X HDW 121 V120\Sources\Timers\	ASM	3,537	3/27/2010 16:36
RTI_ISR.ASM	F:\662X HDW 121 V120\Sources\Timers\	ASM	2,480	6/16/2006 9:30
LICENSE_USBBWRITE.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	3,871	8/28/2005 8:51
USBA_PWM_WRITE.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	4,126	9/20/2005 19:56
USBA_VPW_WRITE.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	4,130	9/20/2005 19:42
USBACANWRITE.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	4,021	11/19/2014 17:26
USBAREAD.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	8,474	5/19/2006 22:09
USBASICIWRITE.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	4,047	11/15/2005 21:53
USBB_MSGPROCESS.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	1,573	8/31/2005 10:55
USBB_RESPONSE_MESSAGES.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	5,427	6/16/2006 10:38
USBBREAD.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	5,221	5/19/2006 22:13
USBBWRITE.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	3,774	8/27/2005 21:51
USBCOMRESET.ASM	F:\662X HDW 121 V120\Sources\USB\	ASM	846	8/31/2005 10:51
Jvectors.ASM	F:\662X HDW 121 V120\Sources\Vectors\	ASM	3,624	5/15/2006 10:07
Can_USB_Cable_Ken.b##	F:\HP_Tuners_Ken_RevX6\	b##	212,012	12/8/2005 10:35
Can_USB_Cable_Ken.b#1	F:\HP_Tuners_Ken_RevX6\	b#1	217,340	2/24/2006 13:42
Can_USB_Cable_Ken.b#2	F:\HP_Tuners_Ken_RevX6\	b#2	216,236	2/24/2006 13:27
Can_USB_Cable_Ken.b#3	F:\HP_Tuners_Ken_RevX6\	b#3	217,268	2/21/2006 10:54
Can_USB_Cable_Ken.b#4	F:\HP_Tuners_Ken_RevX6\	b#4	216,884	2/21/2006 10:07
Can_USB_Cable_Ken.b#5	F:\HP_Tuners_Ken_RevX6\	b#5	216,548	2/17/2006 12:37
Can_USB_Cable_Ken.b#6	F:\HP_Tuners_Ken_RevX6\	b#6	215,732	2/17/2006 11:07
Can_USB_Cable_Ken.b#7	F:\HP_Tuners_Ken_RevX6\	b#7	215,732	2/17/2006 11:07
Can_USB_Cable_Ken.b#8	F:\HP_Tuners_Ken_RevX6\	b#8	216,860	2/17/2006 11:01
Can_USB_Cable_Ken.b#9	F:\HP_Tuners_Ken_RevX6\	b#9	216,860	2/6/2006 18:56
Can_USB_Cable_Ken.brd	F:\HP_Tuners_Ken_RevX6\	brd	217,340	2/24/2006 13:42
Can_USB_Cable_Ken.erc	F:\HP_Tuners_Ken_RevX6\	erc	1,628	2/24/2006 13:36
Can_USB_Cable_Ken.pro	F:\HP_Tuners_Ken_RevX6\	pro	671	2/24/2006 13:28
Can_USB_Cable_Ken.s##	F:\HP_Tuners_Ken_RevX6\	s##	380,035	10/26/2005 6:22
Can_USB_Cable_Ken.s#1	F:\HP_Tuners_Ken_RevX6\	s#1	385,616	2/17/2006 11:01



